

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	:		Chapter 11
	:		
ZEN JV, LLC, <i>et al.</i> , <sup>1</sup>	:		Case No. 25-11195 (JKS)
	:		
Debtors.	:		(Jointly Administered)
	:		
	:		<b>Objection Deadline: December 17, 2025 at 4:00 p.m. (ET)</b>
	:		<b>Hearing Date: January 27, 2026 at 2:30 p.m. (ET)</b>

**FOURTH MONTHLY, SECOND INTERIM AND FINAL APPLICATION OF  
RICHARDS, LAYTON & FINGER, P.A. FOR ALLOWANCE OF COMPENSATION  
FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES  
AS CO-COUNSEL TO THE DEBTORS FOR (I) THE MONTHLY PERIOD FROM  
OCTOBER 1, 2025 THROUGH OCTOBER 14, 2025; (II) THE INTERIM PERIOD  
FROM SEPTEMBER 1, 2025 THROUGH OCTOBER 14, 2025; AND (III) THE  
FINAL PERIOD FROM JUNE 24, 2025 THROUGH OCTOBER 14, 2025**

Name of Applicant:	<u>Richards, Layton &amp; Finger, P.A.</u>
Authorized to Provide Professional Services to:	<u>the above-captioned debtors and</u> <u>debtors-in-possession</u>
Date of Retention:	<u>August 1, 2025 <i>nunc pro tunc</i> to</u> <u>June 24, 2025</u>
Monthly Compensation Period for which compensation and reimbursement is sought:	<u>October 1, 2025 through October 14, 2025</u>
Amount of monthly compensation sought as actual, reasonable, and necessary:	<u>\$165,385.00</u>
Amount of monthly expense reimbursement sought as actual, reasonable, and necessary:	<u>\$8,747.44</u>
Interim Compensation Period for which compensation and reimbursement is sought:	<u>September 1, 2025 through October 14, 2025</u>

<sup>1</sup> The Debtors in these cases, along with the last four digits of each debtor's federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors' address is 200 N LaSalle Street #900, Chicago, IL 60601.

Amount of interim compensation sought as actual, reasonable, and necessary: \$537,808.00

Amount of interim expense reimbursement sought as actual, reasonable, and necessary: \$10,257.07

Final Compensation Period for which compensation and reimbursement is sought: June 24, 2025 through October 14, 2025

Amount of final compensation sought as actual, reasonable, and necessary: \$2,058,653.00<sup>2</sup>

Amount of final expense reimbursement sought as actual, reasonable, and necessary: \$45,769.59

This is a(n): X monthly X interim X final application

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<sup>2</sup> The amount (i) takes into account a voluntary reduction in the amount of \$42.50 in the first interim fee period as approved pursuant to the first interim fee order at Docket No. 495 (the “**Agreed Fee Reduction**”), and (ii) includes actual and estimated fees and expenses (the “**Estimated Fees and Expenses**”) for services rendered by Richards, Layton & Finger, P.A. (“**RL&F**”) from October 15, 2025 through and including the filing and prosecution of all final fee applications of the Debtors’ professionals (the “**Estimated Period**”), in connection with (a) the preparation, filing, service and prosecution of this final fee application (this “**Application**”) as well as the final fee applications of the Debtors’ other professionals (collectively, with this Application, the “**Final Fee Applications**”) and (b) the preparation for the final fee hearing with respect to the Final Fee Applications. The Estimated Fees and Expenses include combined RL&F attorney and paralegal time up to \$100,000.00 in total fees and related expenses. The Estimated Fees and Expenses are, by their very terms, estimates, and thus are strictly without prejudice to RL&F’s rights to request payment for actual fees and expenses incurred during the Estimated Period, which may exceed such amounts.

Summary of previous fee applications for the interim compensation period:

		<b>Total Amount Requested</b>		<b>Total Amount Approved to Date via Certification of No Objection</b>		<b>Holdback Fees Requested</b>
<b>Date Filed and Docket No.</b>	<b>Period Covered</b>	<b>Fees</b>	<b>Expenses</b>	<b>Fees (@ 80%)</b>	<b>Expenses (@ 100%)</b>	<b>Fees (@ 20%)</b>
10/20/25  Docket No. 471	9/1/25 - 9/30/25	\$372,423.00	\$1,509.63	\$297,938.40	\$1,509.63	\$74,484.60
<b>Total:</b>		<b>\$372,423.00</b>	<b>\$1,509.63</b>	<b>\$297,938.40</b>	<b>\$1,509.63</b>	<b>\$74,484.60</b>

Prior Applications Filed:

<b>Date Filed</b>	<b>Period Covered</b>	<b>Fees</b>	<b>Expenses</b>
8/25/25	6/24/25 – 7/31/25	\$917,032.50	\$32,298.74
9/16/25	8/1/25 – 8/31/25	\$503,855.00	\$3,212.78
10/20/25	9/1/25 – 9/30/25	\$372,423.00	\$1,509.63

**MONTHLY COMPENSATION BY PROFESSIONAL<sup>1</sup>**  
**OCTOBER 1, 2025 THROUGH OCTOBER 14, 2025**

<b>Name of Professional Individual</b>	<b>Position, year assumed position, prior relevant experience, year of obtaining relevant license to practice</b>	<b>Hourly Billing Rate (including changes)</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Daniel J. DeFranceschi	Joined firm as associate in 1990. Director in 2000. Member of DE Bar since 1989.	\$1,500.00	0.2	\$300.00
Zachary I. Shapiro	Joined firm as associate in 2007. Director in 2019. Member of DE Bar since 2008.	\$1,175.00	68.6	\$80,605.00
Robert C. Maddox	Joined firm as associate in 2009. Counsel in 2021. Member of DE Bar since 2009.	\$1,000.00	2.5	\$2,500.00
Huiqi Vicky Liu	Joined firm as associate in 2020. Member of DE Bar since 2022.	\$800.00	48.5	\$38,800.00
Clint M. Carlisle	Joined firm as associate in 2025. Member of NY Bar since 2021. Member of DE Bar since 2024.	\$800.00	24.9	\$19,920.00
Colin A. Meehan	Joined firm as associate in 2024. Member of DE Bar since 2023.	\$650.00	9.7	\$6,305.00
Barbara J. Witters	Paralegal since 2000. Joined firm in 2000.	\$425.00	1.7	\$722.50
Rebecca V. Speaker	Paralegal since 2002. Joined firm in 2001.	\$425.00	23.1	\$9,817.50
Erin N. Weyl	Paralegal since 2021. Joined firm in 2024.	\$425.00	5.0	\$2,125.00
Tesia S. Smith	Case management assistant since 2016. Joined firm in 1996.	\$325.00	8.3	\$2,697.50
Jeanne T. Kolb	Case management assistant since 2023. Joined firm in 2015.	\$325.00	4.9	\$1,592.50
<b>TOTAL</b>			<b>197.4</b>	<b>\$165,385.00</b>

<sup>1</sup> Unless otherwise noted, the professionals listed are members of RLF's Bankruptcy and Corporate Restructuring Department.

Grand Total	\$165,385.00
Attorney Compensation	\$148,430.00
Total Attorney Hours	154.4
Blended Rate	\$961.33

**INTERIM COMPENSATION BY PROFESSIONAL<sup>1</sup>**  
**SEPTEMBER 1, 2025 THROUGH OCTOBER 14, 2025**

<b>Name of Professional Individual</b>	<b>Position, year assumed position, prior relevant experience, year of obtaining relevant license to practice</b>	<b>Hourly Billing Rate (including changes)</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Daniel J. DeFranceschi	Joined firm as associate in 1990. Director in 2000. Member of DE Bar since 1989.	\$1,500.00	1.3	\$1,950.00
Tara J. Hoffner	Business Department. Joined firm as associate in 1996. Director in 2004. Member of DE Bar since 1996.	\$1,295.00	0.4	\$518.00
Mark A. Kurtz	Business Department. Joined firm as associate in 2004. Director in 2015. Member of DE Bar since 2005.	\$1,150.00	0.3	\$345.00
Zachary I. Shapiro	Joined firm as associate in 2007. Director in 2019. Member of DE Bar since 2008.	\$1,175.00	172.1	\$202,217.50
Cory D. Kandestin	Joined firm as associate in 2007. Counsel in 2015. Director in 2024. Member of DE Bar since 2007.	\$1,175.00	1.6	\$1,880.00
Robert C. Maddox	Joined firm as associate in 2009. Counsel in 2021. Member of DE Bar since 2009.	\$1,000.00	22.6	\$22,600.00
Frank Y. Sun	Business Department. Joined firm as associate in 2017. Member of DE Bar since 2017.	\$900.00	0.2	\$180.00
Huiqi Vicky Liu	Joined firm as associate in 2020. Member of DE Bar since 2022.	\$800.00	160.9	\$128,720.00

<sup>1</sup> Unless otherwise noted, the professionals listed are members of RLF's Bankruptcy and Corporate Restructuring Department.

<b>Name of Professional Individual</b>	<b>Position, year assumed position, prior relevant experience, year of obtaining relevant license to practice</b>	<b>Hourly Billing Rate (including changes)</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Clint M. Carlisle	Joined firm as associate in 2025. Member of NY Bar since 2021. Member of DE Bar since 2024.	\$800.00	145.1	\$116,080.00
Colin A. Meehan	Joined firm as associate in 2024. Member of DE Bar since 2023.	\$650.00	44.4	\$28,860.00
Katherine R. Strauch	Joined firm as associate in 2025.	\$575.00	0.8	\$460.00
Barbara J. Witters	Paralegal since 2000. Joined firm in 2000.	\$425.00	2.2	\$935.00
Rebecca V. Speaker	Paralegal since 2002. Joined firm in 2001.	\$425.00	47.9	\$20,357.50
Erin N. Weyl	Paralegal since 2021. Joined firm in 2024.	\$425.00	12.0	\$5,100.00
Tesia S. Smith	Case management assistant since 2016. Joined firm in 1996.	\$325.00	9.2	\$2,990.00
Jeanne T. Kolb	Case management assistant since 2023. Joined firm in 2015.	\$325.00	14.2	\$4,615.00
<b>TOTAL</b>			<b>635.2</b>	<b>\$537,808.00</b>

Grand Total	\$537,808.00
Attorney Compensation	\$503,810.50
Total Attorney Hours	549.7
Blended Rate	\$916.52

**FINAL COMPENSATION BY PROFESSIONAL<sup>1</sup>**  
**JUNE 24, 2025 THROUGH OCTOBER 14, 2025**

<b>Name of Professional Individual</b>	<b>Position, year assumed position, prior relevant experience, year of obtaining relevant license to practice</b>	<b>Hourly Billing Rate (including changes)</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Daniel J. DeFranceschi	Joined firm as associate in 1990. Director in 2000. Member of DE Bar since 1989.	\$1,500.00	24.9	\$37,350.00
Tara J. Hoffner	Business Department. Joined firm as associate in 1996. Director in 2004. Member of DE Bar since 1996.	\$1,295.00	0.4	\$518.00
Mark A. Kurtz	Business Department. Joined firm as associate in 2004. Director in 2015. Member of DE Bar since 2005.	\$1,150.00	99.3	\$114,195.00
		\$575.00	6.0	\$3,450.00
Zachary I. Shapiro	Joined firm as associate in 2007. Director in 2019. Member of DE Bar since 2008.	\$1,175.00	479.3	\$563,177.50
Katharine L. Mowery	Litigation Department. Joined firm as associate in 2012. Director in 2021. Member of DE Bar since 2011.	\$1,050.00	39.2	\$41,160.00
Cory D. Kandestin	Joined firm as associate in 2007. Counsel in 2015. Director in 2024. Member of DE Bar since 2007.	\$1,175.00	3.9	\$4,582.50
Robert C. Maddox	Joined firm as associate in 2009. Counsel in 2021. Member of DE Bar since 2009.	\$1,000.00	183.8	\$183,800.00
Jake M. Crosetto	Business Department. Joined firm as associate in 2014. Counsel in 2022. Member of DE Bar since 2014.	\$950.00	22.6	\$21,470.00

<sup>1</sup> Unless otherwise noted, the professionals listed are members of RLF's Bankruptcy and Corporate Restructuring Department.



<b>Name of Professional Individual</b>	<b>Position, year assumed position, prior relevant experience, year of obtaining relevant license to practice</b>	<b>Hourly Billing Rate (including changes)</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Robert S. Kissel	Business Department. Joined firm as associate in 2022. Member of DE Bar since 2017.	\$900.00	2.0	\$1,800.00
Frank Y. Sun	Business Department. Joined firm as associate in 2017. Member of DE Bar since 2017.	\$900.00	75.6	\$68,040.00
		\$450.00	1.5	\$675.00
Huiqi Vicky Liu	Joined firm as associate in 2020. Member of DE Bar since 2022.	\$800.00	419.2	\$335,360.00
James F. McCauley	Joined firm as associate in 2020. Member of DE Bar since 2022.	\$800.00	6.1	\$4,880.00
David E. Milano	Corporate Department. Joined firm as associate in 2020. Member of DE Bar since 2022.	\$800.00	2.8	\$2,240.00
Clint M. Carlisle	Joined firm as associate in 2025. Member of NY Bar since 2021. Member of DE Bar since 2024.	\$800.00	355.8	\$284,640.00
Thomas K. Malone	Business Department. Joined firm as associate in 2021. Member of DE Bar since 2022.	\$750.00	45.8	\$34,350.00
Alexander R. Steiger	Joined firm as associate in 2022. Member of NY Bar since 2022. Member of DE Bar since 2023.	\$750.00	0.1	\$75.00
Zachary J. Javorsky	Joined firm as associate in 2022. Member of DE Bar since 2022.	\$700.00	11.9	\$8,330.00
Stanley N. Medlin	Litigation Department. Joined firm as associate in 2025. Member of the TN Bar since 2022. Member of the PA Bar since 2025.	\$700.00	24.8	\$17,360.00

<b>Name of Professional Individual</b>	<b>Position, year assumed position, prior relevant experience, year of obtaining relevant license to practice</b>	<b>Hourly Billing Rate (including changes)</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Gabriela Z. Monasterio	Litigation Department. Joined firm as associate in 2023. Member of DE Bar since 2023.	\$650.00	30.0	\$19,500.00
Colin A. Meehan	Joined firm as associate in 2024. Member of DE Bar since 2023.	\$650.00	134.4	\$87,360.00
Nicholas A. Franchi	Joined firm as associate in 2024. Member of DE Bar since 2024.	\$575.00	13.5	\$7,762.50
Katherine R. Strauch	Joined firm as associate in 2025.	\$575.00	0.8	\$460.00
Barbara J. Witters	Paralegal since 2000. Joined firm in 2000.	\$425.00	15.0	\$6,375.00
Rebecca V. Speaker	Paralegal since 2002. Joined firm in 2001.	\$425.00	137.7	\$58,522.50
Christopher J. Ruggiero	Business Department. Paralegal since 2012. Joined firm in 2015.	\$425.00	0.2	\$85.00
LeeAnn Scavina	Paralegal since 2005. Joined firm in 2023.	\$425.00	1.2	\$510.00
Erin N. Weyl	Paralegal since 2021. Joined firm in 2024.	\$425.00	17.7	\$7,522.50
Gregory J. Nequist	MIS Litigation Support Department. Senior Practice Support Analyst. Joined firm in 2015.	\$425.00	65.5	\$27,837.50
Carlos B. Terreforte	MIS Litigation Support Department. Joined firm in 2015.	\$425.00	3.9	\$1,657.50
Tesia S. Smith	Case management assistant since 2016. Joined firm in 1996.	\$325.00	17.5	\$5,687.50
Jeanne T. Kolb	Case management assistant since 2023. Joined firm in 2015.	\$325.00	24.5	\$7,962.50
<b>TOTAL</b>			<b>2,266.9</b>	<b>\$1,958,695.50<sup>2</sup></b>

<sup>2</sup> This amount does **not** include the Estimated Fees and Expenses for the Estimated Period.

Grand Total	\$1,958,695.50
Attorney Compensation	\$1,842,535.50
Total Attorney Hours	1,983.7
Blended Rate	\$928.84

**MONTHLY COMPENSATION BY PROJECT CATEGORY**  
**OCTOBER 1, 2025 THROUGH OCTOBER 14, 2025**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration (A)	4.6	\$4,130.00
Creditor Inquiries (B)	0.0	\$0.00
Meetings (C)	4.0	\$3,170.00
Executory Contracts/Unexpired Leases (D)	6.4	\$5,157.50
Automatic Stay/Adequate Protection (E)	0.0	\$0.00
Plan of Reorganization/Disclosure Statement (F)	80.3	\$78,375.00
Use, Sale, Lease of Assets (G)	0.3	\$315.00
Cash Collateral/DIP Financing (H)	0.1	\$117.50
Claims Administration (I)	5.0	\$4,172.50
Court Hearings (J)	26.3	\$21,452.50
General Corporate/Real Estate (K)	4.2	\$4,935.00
Schedules/SOFA/U.S. Trustee Reports (L)	5.6	\$4,105.00
Employee Issues (M)	0.0	\$0.00
Environmental (N)	0.0	\$0.00
Tax Issues (O)	0.0	\$0.00
Litigation/Adversary Proceedings (P)	3.8	\$3,240.00
RL&F Retention (Q-1)	0.0	\$0.00
Retention of Others (Q-2)	7.2	\$6,622.50
RL&F Fee Applications (R-1)	15.6	\$9,035.00
Fee Applications of Others (R-2)	34.0	\$20,557.50
Vendor/Suppliers (S)	0.0	\$0.00
Non-Working Travel (T)	0.0	\$0.00
Utilities (U)	0.0	\$0.00
Insurance (V)	0.0	\$0.00
<b>TOTAL</b>	<b>197.4</b>	<b>\$165,385.00</b>

**INTERIM COMPENSATION BY PROJECT CATEGORY**  
**SEPTEMBER 1, 2025 THROUGH OCTOBER 14, 2025**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration (A)	12.7	\$10,707.50
Creditor Inquiries (B)	0.2	\$160.00
Meetings (C)	16.6	\$12,940.00
Executory Contracts/Unexpired Leases (D)	30.6	\$26,167.50
Automatic Stay/Adequate Protection (E)	2.2	\$1,760.00
Plan of Re-Organization/Disclosure Statement (F)	282.4	\$259,623.00
Use, Sale, Lease of Assets (G)	1.1	\$967.50
Cash Collateral/DIP Financing (H)	1.5	\$1,762.50
Claims Administration (I)	64.2	\$52,447.50
Court Hearings (J)	43.7	\$36,015.00
General Corporate/Real Estate (K)	4.4	\$5,095.00
Schedules/SOFA/U.S. Trustee Reports (L)	13.1	\$9,880.00
Employee Issues (M)	2.4	\$2,820.00
Environmental (N)	0.0	\$0.00
Tax Issues (O)	0.6	\$405.00
Litigation/Adversary Proceedings (P)	37.9	\$38,330.00
RL&F Retention (Q-1)	0.0	\$0.00
Retention of Others (Q-2)	22.4	\$18,235.00
RL&F Fee Applications (R-1)	51.3	\$29,490.00
Fee Applications of Others (R-2)	47.5	\$30,570.00
Vendor/Suppliers (S)	0.3	\$352.50
Non-Working Travel (T)	0.0	\$0.00
Utilities (U)	0.0	\$0.00
Insurance (V)	0.1	\$80.00
<b>TOTAL</b>	<b>635.2</b>	<b>\$537,808.00</b>

**FINAL COMPENSATION BY PROJECT CATEGORY**  
**JUNE 24, 2025 THROUGH OCTOBER 14, 2025**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration (A)	78.4	\$69,560.00
Creditor Inquiries (B)	0.5	\$325.00
Meetings (C)	36.3	\$28,222.50
Executory Contracts/Unexpired Leases (D)	144.7	\$119,952.50
Automatic Stay/Adequate Protection (E)	2.2	\$1,760.00
Plan of Re-Organization/Disclosure Statement (F)	484.8	\$446,463.00
Use, Sale, Lease of Assets (G)	444.1	\$421,590.00
Cash Collateral/DIP Financing (H)	49.8	\$52,952.50
Claims Administration (I)	96.9	\$78,150.00
Court Hearings (J)	182.7	\$151,607.50
General Corporate/Real Estate (K)	5.1	\$5,917.50
Schedules/SOFA/U.S. Trustee Reports (L)	65.6	\$55,695.00
Employee Issues (M)	30.7	\$27,755.00
Environmental (N)	0.0	\$0.00
Tax Issues (O)	11.9	\$9,557.50
Litigation/Adversary Proceedings (P)	388.3	\$323,027.50
RL&F Retention (Q-1)	15.9	\$11,955.00
Retention of Others (Q-2)	74.0	\$59,845.00
RL&F Fee Applications (R-1)	84.6	\$47,967.50
Fee Applications of Others (R-2)	58.9	\$38,932.50
Vendor/Suppliers (S)	0.3	\$352.50
Non-Working Travel (T)	7.5	\$4,125.00
Utilities (U)	1.7	\$1,157.50
Insurance (V)	2.0	\$1,825.00
<b>TOTAL</b>	<b>2,266.9</b>	<b>\$1,958,695.50<sup>1</sup></b>

<sup>1</sup> This amount does **not** include the Estimated Fees and Expenses for the Estimated Period.

**MONTHLY EXPENSE SUMMARY**  
**OCTOBER 1, 2025 THROUGH OCTOBER 14, 2025**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Binding		\$0.00
Business Meals	<i>See attached meal chart</i>	\$110.21
Conference Calling		\$0.00
Court Reporting		\$212.85
Document Retrieval	Pacer	\$200.70
Equipment Rental		\$0.00
Facsimile		\$0.00
Filing/Court Fees		\$0.00
In-House Reproduction (Duplication/Printing)	Duplicating: 0 @ \$.10 pg. Printing: 1,827 @ \$.10 pg.	\$182.70
Inside Courier & Expense Carriers		\$0.00
Legal Research	Bloomberg	\$2,752.20
Long Distance Telephone		\$0.00
Outside Courier & Expense Carriers	Blue Marble	\$171.50
Outside Reproduction	Parcels	\$622.60
Overtime		\$0.00
Postage		\$0.00
Professional Services	PLUSnxt (Services re: database for discovery)	\$4,494.68
Record Retrieval		\$0.00
RLF Service Corp		\$0.00
Room Rental		\$0.00
Stationery Supplies		\$0.00
Travel Expenses		\$0.00
<b>TOTAL</b>		<b>\$8,747.44</b>

<b>BUSINESS MEAL DETAIL</b>				
<b>Date</b>	<b>Provider</b>	<b>Meal &amp; Number of People</b>	<b>Description</b>	<b>Amount</b>
10/7/25	Manhattan Bagel	Breakfast for 5	10/7/25 Confirmation Hearing	\$97.46
10/7/25	Starbucks	Coffee for 2	10/7/25 Confirmation Hearing	\$12.75
<b>TOTAL</b>				<b>\$110.21</b>



**INTERIM EXPENSE SUMMARY**  
**SEPTEMBER 1, 2025 THROUGH OCTOBER 14, 2025**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Binding		\$0.00
Business Meals	<i>See previous monthly fee applications</i>	\$164.69
Conference Calling		\$0.00
Court Reporting	<i>See previous monthly fee applications</i>	\$404.25
Document Retrieval	<i>See previous monthly fee applications</i>	\$357.10
Equipment Rental		\$0.00
Facsimile		\$0.00
Filing/Court Fees		\$0.00
In-House Reproduction (Duplication/Printing)	Duplicating: 0 @ \$.10 pg. Printing: 2,494 @ \$.10 pg.	\$249.40
Inside Courier & Expense Carriers		\$0.00
Legal Research	<i>See previous monthly fee applications</i>	\$3,007.00
Long Distance Telephone		\$0.00
Outside Courier & Expense Carriers	<i>See previous monthly fee applications</i>	\$294.50
Outside Reproduction	<i>See previous monthly fee applications</i>	\$1,285.45
Overtime		\$0.00
Postage		\$0.00
Professional Services		\$4,494.68
Record Retrieval		\$0.00
RLF Service Corp		\$0.00
Room Rental		\$0.00
Stationery Supplies		\$0.00
Travel Expenses		\$0.00
<b>TOTAL</b>		<b>\$10,257.07</b>

**FINAL EXPENSE SUMMARY**  
**JUNE 24, 2025 THROUGH OCTOBER 14, 2025**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Binding		\$0.00
Business Meals	<i>See previous monthly fee applications</i>	\$871.45
Conference Calling		\$0.00
Court Reporting	<i>See previous monthly fee applications</i>	\$1,505.95
Document Retrieval	<i>See previous monthly fee applications</i>	\$1,096.80
Equipment Rental		\$0.00
Facsimile		\$0.00
Filing/Court Fees	<i>See previous monthly fee applications</i>	\$17,729.00
In-House Reproduction (Duplication/Printing)	Duplicating: 0 @ \$.10 pg. Printing: 13,032 @ \$.10 pg.	\$1,303.20
Inside Courier & Expense Carriers	<i>See previous monthly fee applications</i>	\$0.00
Legal Research	<i>See previous monthly fee applications</i>	\$6,892.60
Long Distance Telephone		\$0.00
Outside Courier & Expense Carriers	<i>See previous monthly fee applications</i>	\$876.25
Outside Reproduction	<i>See previous monthly fee applications</i>	\$6,320.75
Overtime		\$0.00
Postage		\$0.00
Professional Services		\$4,494.68
Record Retrieval		\$0.00
Room Rental		\$0.00
Stationery Supplies		\$0.00
Travel Expenses	<i>See previous monthly fee applications</i>	\$4,678.91
<b>TOTAL</b>		<b>\$45,769.59</b>

**CUSTOMARY AND COMPARABLE COMPENSATION  
DISCLOSURES FOR THE INTERIM COMPENSATION  
PERIOD OF SEPTEMBER 1, 2025 THROUGH OCTOBER 14, 2025<sup>1</sup>**

Category of Timekeeper	Blended Hourly Rate	
	Billed Firm-wide for preceding year (2024) <sup>2</sup>	Billed September 1, 2025 through October 14, 2025
Partner	\$1,085.33	\$1,177.64
Counsel	\$831.72	\$1,000.00
Associate	\$632.47	\$780.59
Paralegal	\$354.25	\$425.00
Aggregated	\$805.98	\$866.63

<sup>1</sup> This chart represents information solely relating to the interim period from September 1, 2025 through October 14, 2025. The information for the period from June 24, 2025 through August 31, 2025 is set forth in the previously filed first interim fee application [Docket No. 398].

<sup>2</sup> The billable rate for RL&F attorneys are adjusted on January 1 of each year. The data in this column excludes 2024 blended hourly rate information for the Bankruptcy and Corporate Restructuring Department at RL&F.

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

	X		
	:		
In re:	:		Chapter 11
	:		
ZEN JV, LLC, <i>et al.</i> , <sup>1</sup>	:		Case No. 25-11195 (JKS)
	:		
Debtors.	:		(Jointly Administered)

**BUDGET FOR RICHARDS, LAYTON & FINGER, P.A.,  
CO-COUNSEL TO THE DEBTOR, FOR THE PERIOD  
FROM SEPTEMBER 1, 2025 THROUGH OCTOBER 14, 2025<sup>2</sup>**

Date Retention Approved: August 1, 2025

Date Budget Approved by Client: This budget reflects an aggregation of budgets that were provided to, and approved by, the Debtors and certain other estate professionals on a rolling basis throughout the interim period.

PROJECT CATEGORY	ESTIMATED HOURS	ESTIMATED FEES*
Case Administration	15	\$15,000.00
Creditor Inquiries	5	\$5,000.00
Meetings	20	\$20,000.00
Executory Contracts/Unexpired Leases	35	\$35,000.00
Automatic Stay/Adequate Protection	5	\$5,000.00

<sup>1</sup> The Debtors in these cases, along with the last four digits of each debtor's federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors' address is 200 N LaSalle Street #900, Chicago, IL 60601.

<sup>2</sup> This budget may be amended from time to time, including before, during, and after the compensation period described herein, as may be necessary to reflect changed circumstances or unexpected developments in these cases. Any such amended budget will be provided to the Debtors. This budget is only an estimate of the fees to be incurred and the hours to be billed for the compensation period, including within each project category, and is based solely on services anticipated to be rendered in light of circumstances known to RL&F at the time the budget was prepared. This budget shall not be deemed to limit or impose a cap on fees actually incurred or hours actually billed by RL&F. This budget also does not limit the ability of RL&F to perform those services necessary to represent the Debtors, and to be compensated for such services. Nor shall this budget restrict or restrain RL&F's ability to seek approval of fees actually incurred that may be in excess of this budget.

<b>PROJECT CATEGORY</b>	<b>ESTIMATED HOURS</b>	<b>ESTIMATED FEES*</b>
Plan of Reorganization/Disclosure Statement	315	\$311,500.00
Use, Sale, Lease of Assets	5	\$5,000.00
Cash Collateral/DIP Financing	5	\$5,000.00
Claims Administration	75	\$74,500.00
Court Hearings	50	\$49,500.00
General Corporate/Real Estate	5	\$5,000.00
Schedules/SOFA/U.S. Trustee Reports	15	\$15,000.00
Employee Issues	5	\$5,000.00
Environmental	0	\$0.00
Tax Issues	5	\$5,000.00
Litigation/Adversary Proceedings	45	\$45,500.00
RL&F Retention	0	\$0.00
Retention of Others	25	\$25,000.00
RL&F Fee Applications	60	\$59,500.00
Fee Applications of Others	55	\$54,500.00
Vendor/Suppliers	5	\$5,000.00
Non-Working Travel	0	\$0.00
Utilities	0	\$0.00
Insurance	5	\$5,000.00
<b>TOTAL</b>	<b>755.0</b>	<b>\$750,000.00</b>

\*The estimated fees for each project category were calculated by multiplying the estimated number of hours by \$987.50, which is the average hourly rate for the RL&F attorneys expected to work on the matter during the budget period as set forth in the accompanying Staffing Plan.

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
In re:	:	Chapter 11
	:	
ZEN JV, LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 25-11195 (JKS)
	:	
Debtors.	:	(Jointly Administered)

**STAFFING PLAN FOR RICHARDS, LAYTON & FINGER, P.A.,  
CO-COUNSEL TO THE DEBTOR, FOR THE PERIOD  
FROM SEPTEMBER 1, 2025 THROUGH OCTOBER 14, 2025<sup>2</sup>**

Date Retention Approved: August 1, 2025

Date Budget Approved by Client: This staffing plan reflects an aggregation of staffing plans that were provided to, and approved by, the Debtors and certain other estate professionals on a rolling basis throughout the interim period.

CATEGORY OF TIMEKEEPER	NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE BUDGET PERIOD	AVERAGE HOURLY RATE
Directors	2	\$1,337.50
Counsel	1	\$1,000.00
Associates	3	\$750.00
Paralegals	3	\$425.00

<sup>1</sup> The Debtors in these cases, along with the last four digits of each debtor's federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors' address is 200 N LaSalle Street #900, Chicago, IL 60601.

<sup>2</sup> This staffing plan may be amended to reflect changed circumstances or unexpected developments. Any such amended staffing plan will be provided to the Debtors.

**SUMMARY OF FEES/HOURS BUDGETED COMPARED WITH FEES/HOURS  
BILLED FOR THE INTERIM COMPENSATION PERIOD SEPTEMBER 1, 2025  
THROUGH OCTOBER 14, 2025**

<b>Project Category</b>	<b>Budgeted Hours</b>	<b>Billed Hours</b>	<b>Budgeted Fees</b>	<b>Billed Fees</b>
Case Administration (A)	15	12.7	\$15,000.00	\$10,707.50
Creditor Inquiries (B)	5	0.2	\$5,000.00	\$160.00
Meetings (C)	20	16.6	\$20,000.00	\$12,940.00
Executory Contracts/Unexpired Leases (D)	35	30.6	\$35,000.00	\$26,167.50
Automatic Stay/Adequate Protection (E)	5	2.2	\$5,000.00	\$1,760.00
Plan of Reorganization/Disclosure Statement (F)	315	282.4	\$311,500.00	\$259,623.00
Use, Sale, Lease of Assets (G)	5	1.1	\$5,000.00	\$967.50
Cash Collateral/DIP Financing (H)	5	1.5	\$5,000.00	\$1,762.50
Claims Administration (I)	75	64.2	\$74,500.00	\$52,447.50
Court Hearings (J)	50	43.7	\$49,500.00	\$36,015.00
General Corporate/Real Estate (K)	5	4.4	\$5,000.00	\$5,095.00
Schedules/SOFA/U.S. Trustee Reports (L)	15	13.1	\$15,000.00	\$9,880.00
Employee Issues (M)	5	2.4	\$5,000.00	\$2,820.00
Environmental (N)	0	0.0	\$0.00	\$0.00
Tax Issues (O)	5	0.6	\$5,000.00	\$405.00
Litigation/Adversary Proceedings (P)	45	37.9	\$45,500.00	\$38,330.00
RL&F Retention (Q-1)	0	0.0	\$0.00	\$0.00
Retention of Others (Q-2)	25	22.4	\$25,000.00	\$18,235.00
RL&F Fee Applications (R-1)	60	51.3	\$59,500.00	\$29,490.00
Fee Applications of Others (R-2)	55	47.5	\$54,500.00	\$30,570.00
Vendor/Suppliers (S)	5	0.3	\$5,000.00	\$352.50
Non-Working Travel (T)	0	0.0	\$0.00	\$0.00
Utilities (U)	0	0.0	\$0.00	\$0.00
Insurance (V)	5	0.1	\$5,000.00	\$80.00
<b>TOTAL</b>	<b>755.0</b>	<b>635.2</b>	<b>\$750,000.00</b>	<b>\$537,808.00</b>

**ADDITIONAL INFORMATION RELATED TO INTERIM COMPENSATION  
PERIOD (SEPTEMBER 1, 2025 THROUGH OCTOBER 14, 2025)  
WITHIN FINAL FEE APPLICATION**

Rates for Interim Compensation Period are Higher than those Approved or Disclosed at Retention?	No.
Total Compensation <sup>1</sup> Requested for the Interim Compensation Period:	\$537,808.00
Compensation Sought in this Final Application Authorized for Payment to Date for the Interim Compensation Period Pursuant to the Interim Compensation Order:	\$299,448.03
Compensation Sought in this Final Application Already Paid for the Interim Compensation Period Pursuant to the Interim Compensation Order:	\$299,448.03
Compensation Sought for the Interim Compensation Period in this Final Application Not Yet Authorized or Paid:	\$238,359.97
Number of Professionals Included in this Final Application for the Interim Compensation Period:	16
If Applicable, Number of Professionals in this Final Application Not Included in the Staffing Plan for the Interim Compensation Period Approved by Client:	7 <sup>2</sup>
If Applicable, Difference Between Fees Budgeted and Compensation Sought for the Interim Compensation Period:	(\$212,192.00)

<sup>1</sup> Total compensation includes both fees of, and expenses incurred by, RL&F.

<sup>2</sup> These professionals were utilized to perform discrete ancillary tasks that, in many instances, required special expertise.



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

	X		
	:		
In re:	:		Chapter 11
	:		
ZEN JV, LLC, <i>et al.</i> , <sup>1</sup>	:		Case No. 25-11195 (JKS)
	:		
Debtors.	:		(Jointly Administered)
	:		
	:		<b>Objection Deadline: December 22, 2025 at 4:00 p.m. (ET)</b>
	:		<b>Hearing Date: January 27, 2026 at 2:30 p.m. (ET)</b>
	X		

**FOURTH MONTHLY, SECOND INTERIM AND FINAL APPLICATION OF  
RICHARDS, LAYTON & FINGER, P.A. FOR ALLOWANCE OF COMPENSATION  
FOR SERVICES RENDERED AND FOR REIMBURSEMENT OF EXPENSES  
AS CO-COUNSEL TO THE DEBTORS FOR (I) THE MONTHLY PERIOD FROM  
OCTOBER 1, 2025 THROUGH OCTOBER 14, 2025; (II) THE INTERIM PERIOD  
FROM SEPTEMBER 1, 2025 THROUGH OCTOBER 14, 2025; AND (III) THE  
FINAL PERIOD FROM JUNE 24, 2025 THROUGH OCTOBER 14, 2025**

Pursuant to sections 330 and 331 of title 11 of the United States Code, §§ 101-1532 (the “**Bankruptcy Code**”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), the *Order Pursuant to 11 U.S.C. §§ 331, 330, and 105(a) and Fed. R. Bankr. P. 2016 (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (II) Granting Related Relief* [Docket No. 258] (the “**Interim Compensation Order**”), the Plan (as defined below) and the Confirmation Order (as defined below), Richards, Layton & Finger, P.A. (“**RL&F**”) hereby files this *Fourth Monthly, Second Interim and Final Application of Richards,*

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

*Layton & Finger, P.A. for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel to the Debtors for (I) the Monthly Period from October 1, 2025 through October 14, 2025; (II) the Interim Period from September 1, 2025 through October 14, 2025 and (III) the Final Period from June 24, 2025 through October 14, 2025 (the “**Application**”).* By the Application, RL&F seeks (i) a monthly allowance pursuant to the Interim Compensation Order with respect to the sums of \$165,385.00 as compensation and \$8,747.44 for reimbursement of actual and necessary expenses, for a total of \$174,132.44 for the interim period from October 1, 2025 through October 14, 2025 (the “**Monthly Compensation Period**”), (ii) an interim allowance pursuant to the Interim Compensation Order with respect to the sums of \$537,808.00 as compensation and \$10,257.07 for reimbursement of actual and necessary expenses, for a total of \$548,065.07 for the interim period from September 1, 2025 through October 14, 2025 (the “**Interim Compensation Period**”) and (iii) final allowance pursuant to the Interim Compensation Order and Confirmation Order with respect to the sums of \$2,058,653.00<sup>2</sup> as compensation and \$45,769.59 for reimbursement of actual and necessary expenses, for a total of \$2,104,422.59 for the period from June 24, 2025 through October 14, 2025 (the “**Final Compensation Period**”). In support of this Application, RL&F submits the attorney certification attached hereto as **Exhibit C** (the “**Certification**”). In further support of this Application, RL&F respectfully represents as follows:

### **Background**

1. On June 24, 2025 (the “**Petition Date**”), the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) each filed a voluntary petition with this Court for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to manage and

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<sup>2</sup> For the avoidance of doubt, this amount **includes** the Estimated Fees and Expenses for the Estimated Period and takes into account the Agreed Fee Reduction.

operate their businesses as debtors in possession under sections 1107 and 1108 of the Bankruptcy Code. An official committee of unsecured creditors (the “**Creditors’ Committee**”) was appointed in these chapter 11 cases on July 2, 2025 [Docket No. 65].

2. RL&F was retained as co-counsel to the Debtors, effective as of the Petition Date, pursuant to the *Order Authorizing Retention and Employment of Richards, Layton & Finger, P.A. as Co-Counsel to the Debtors and Debtors in Possession Effective as of Petition Date*, entered on August 1, 2025 [Docket No. 264] (the “**Retention Order**”). The Retention Order authorized RL&F to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

3. On October 7, 2025, this Court entered an order [Docket No. 429] (the “**Confirmation Order**”) confirming the *Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation* (the “**Plan**”), which was attached to the Confirmation Order as **Exhibit A** thereto. On October 14, 2025, the effective date of the Plan occurred. *See* Docket No. 458.

### **Compensation Paid and Its Source**

4. All services for which compensation is requested by RL&F were performed for or on behalf of the Debtors.

5. Except to the extent of the retainer paid to RL&F as described in the application seeking approval of RL&F’s employment by the Debtors, during the period covered by this Application, RL&F has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between RL&F and any

other person other than the directors of RL&F for the sharing of compensation to be received for services rendered in these cases.

#### **Fee Statements**

6. The fee statement for the Monthly Compensation Period is attached hereto as **Exhibit A**. The fee statements for the Interim Compensation Period and the Final Compensation Period were attached as Exhibit A to each of the previously filed monthly fee applications. These statements contain daily time logs describing the time spent by each attorney and paraprofessional during the Monthly Compensation Period, the Interim Compensation Period and the Final Compensation Period. To the best of RL&F's knowledge, this Application complies with sections 330 and 331 of the Bankruptcy Code, the applicable Bankruptcy Rules, Local Rule 2016-1, applicable Third Circuit law, and the Interim Compensation Order.

#### **Actual and Necessary Expenses**

7. A summary of actual and necessary expenses and daily logs of expenses incurred by RL&F during the Monthly Compensation Period is attached hereto as **Exhibit B**. A summary of actual and necessary expenses and daily logs of expenses incurred by RL&F during the Interim Compensation Period and the Final Compensation Period were attached as Exhibit B to each of the previously filed monthly fee applications. RL&F charges all of its bankruptcy clients \$0.10 per page for photocopying expenses and \$0.10 per page for printing jobs. Actual long-distance carrier charges for outgoing facsimile transmissions are reflected in the long-distance telephone charges.

8. Regarding providers of on-line legal research (*e.g.*, LEXIS and WESTLAW), RL&F charges all of its clients the standard usage rates these providers charge, which, due to contractual flat fees, may not always equal RL&F's actual cost. RL&F currently is under contract

to pay these providers a flat fee every month. Charging its clients the on-line providers' standard usage rates allows RL&F to cover adequately the monthly flat fees it must pay to these types of providers.

9. RL&F believes the foregoing rates are the market rates that the majority of law firms charge clients for such services. In addition, RL&F believes that such charges are in accordance with the American Bar Association's ("**ABA**") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

### **Summary of Services Rendered**

10. The directors, counsel and associates of RL&F who have rendered professional services in these cases for the Monthly Compensation Period are as follows: Daniel J. DeFranceschi, Zachary I. Shapiro, Robert C. Maddox, Huiqi Vicky Liu, Clint M. Carlisle and Colin A. Meehan. The paraprofessionals of RL&F who have provided services to these attorneys in these cases during the Monthly Compensation Period are as follows: Barbara J. Witters, Rebecca V. Speaker, Erin N. Weyl, Tesia S. Smith and Jeanne T. Kolb.

11. The directors, counsel and associates of RL&F who have rendered professional services in these cases for the Interim Compensation Period are as follows: Daniel J. DeFranceschi, Tara J. Hoffner, Mark A. Kurtz, Zachary I. Shapiro, Cory D. Kandestin, Robert C. Maddox, Frank Y. Sun, Huiqi Vicky Liu, Clint M. Carlisle, Colin A. Meehan and Katherine R. Strauch. The paraprofessionals of RL&F who have provided services to these attorneys in these cases during the Interim Compensation Period are as follows: Barbara J. Witters, Rebecca V. Speaker, Erin N. Weyl, Tesia S. Smith and Jeanne T. Kolb.

12. The directors, counsel and associates of RL&F who have rendered professional

services in these cases for the Final Compensation Period are as follows: Daniel J. DeFranceschi, Tara J. Hoffner, Mark A. Kurtz, Zachary I. Shapiro, Katharine L. Mowery, Cory D. Kandestin, Robert C. Maddox, Jake M. Crosetto, Robert S. Kissel, Frank Y. Sun, Huiqi Vicky Liu, James F. McCauley, David E. Milano, Clint M. Carlisle, Thomas K. Malone, Alexander R. Steiger, Zachary J. Javorsky, Stanley N. Medlin, Gabriela Z. Monasterio, Colin A. Meehan, Nicholas A. Franchi and Katherine R. Strauch. The paraprofessionals of RL&F who have provided services to these attorneys in these cases during the Final Compensation Period are as follows: Barbara J. Witters, Rebecca V. Speaker, Christopher J. Ruggiero, LeeAnn Scavina, Erin N. Weyl, Gregory J. Nequist, Carlos B. Terreforte, Tesia S. Smith and Jeanne T. Kolb.

13. RL&F, by and through the above-named persons, has prepared and/or assisted in the preparation of various motions, applications and orders submitted to the Court for consideration, advised the Debtors on a regular basis with respect to various matters in connection with these cases, and has performed all necessary professional services which are described in detail hereinafter.

#### **Summary of Services By Project**

14. The services rendered by RL&F during the Monthly Compensation Period, the Interim Compensation Period and the Final Compensation Period can be grouped into the categories set forth below. These categories are generally described below, with a more detailed identification of the actual services provided set forth on **Exhibit A** attached hereto and Exhibit A attached to each of the previously filed monthly fee applications. The attorneys and paraprofessionals who rendered services relating to each category are identified, along with the number of hours for each individual and the total compensation sought for each category, in

**Exhibit A** attached hereto and Exhibit A attached to each of the previously filed monthly fee applications.

A. Case Administration/Miscellaneous Matters

Monthly Compensation Period: Fees: \$4,130.00 Total Hours: 4.6

Interim Compensation Period: Fees: \$10,707.50 Total Hours: 12.7

Final Compensation Period: Fees: \$69,560.00 Total Hours: 78.4

This category includes all matters related to filing documents with the Court, service thereof, maintenance of calendars, communications with the U.S. Trustee, review of work in process reports, review of notices of appearance and maintaining service lists.

B. Creditor Inquiries

Monthly Compensation Period: Fees: \$0.00 Total Hours: 0.0

Interim Compensation Period: Fees: \$ \$160.00 Total Hours: 0.2

Final Compensation Period: Fees: \$325.00 Total Hours: 0.5

This category includes all matters related to responding to creditor inquiries.

C. Meetings

Monthly Compensation Period: Fees: \$3,170.00 Total Hours: 4.0

Interim Compensation Period: Fees: \$12,940.00 Total Hours: 16.6

Final Compensation Period: Fees: \$28,222.50 Total Hours: 36.3

This category includes all matters related to preparing for and attending meetings with the Debtors, the Creditors' Committee, individual creditors, the U.S. Trustee, and the Debtors' other professionals.

D. Executory Contracts/Unexpired Leases

Monthly Compensation Period: Fees: \$5,157.50 Total Hours: 6.4

Interim Compensation Period: Fees: \$26,167.50 Total Hours: 30.6

Final Compensation Period: Fees: \$119,952.50 Total Hours: 144.7

This category includes all matters related to contract and lease analysis and matters related to assumption, assignment or rejection of executory contracts and unexpired leases.

E. Automatic Stay/Adequate Protection

Monthly Compensation Period: Fees: \$0.00 Total Hours: 0.0

Interim Compensation Period: Fees: \$1,760.00 Total Hours: 2.2

Final Compensation Period: Fees: \$1,760.00 Total Hours: 2.2

This category includes all matters related to and including all motions to modify the automatic stay, issues related to the effect of the automatic stay or pending matters, and all other types of actions where adequate protection is the central issue.

F. Plan of Reorganization/Disclosure Statement

Monthly Compensation Period: Fees: \$78,375.00 Total Hours: 80.3

Interim Compensation Period: Fees: \$259,623.00 Total Hours: 282.4

Final Compensation Period: Fees: \$446,463.00 Total Hours: 484.8

This category includes all matters related to review, formulation, negotiation, preparation and promulgation of plans of reorganization, disclosure statements, and related corporate documentation and research relating thereto.

G. Use, Sale, Lease of Assets

Monthly Compensation Period: Fees: \$315.00 Total Hours: 0.3

Interim Compensation Period: Fees: \$967.50 Total Hours: 1.1

Final Compensation Period: Fees: \$421,590.00 Total Hours: 444.1



This category includes all matters relating to acquisitions, dispositions and other postpetition uses of property of the estates.

H. Cash Collateral/DIP Financing

Monthly Compensation Period: Fees: \$117.50 Total Hours: 0.1

Interim Compensation Period: Fees: \$1,762.50 Total Hours: 1.5

Final Compensation Period: Fees: \$52,952.50 Total Hours: 49.8

This category includes all matters relating to negotiation and documentation of debtor in possession financing and related issues.

I. Claims Administration

Monthly Compensation Period: Fees: \$4,172.50 Total Hours: 5.0

Interim Compensation Period: Fees: \$52,447.50 Total Hours: 64.2

Final Compensation Period: Fees: \$78,150.00 Total Hours: 96.9

This category includes all matters related to and including claims administration matters and bar date matters, including claims objections and related contested matters.

J. Court Hearings

Monthly Compensation Period: Fees: \$21,452.50 Total Hours: 26.3

Interim Compensation Period: Fees: \$36,015.00 Total Hours: 43.7

Final Compensation Period: Fees: \$151,607.50 Total Hours: 182.7

This category includes all matters related to preparation for and attendance at court hearings.

K. General Corporate/Real Estate

Monthly Compensation Period: Fees: \$4,935.00 Total Hours: 4.2

Interim Compensation Period: Fees: \$5,095.00 Total Hours: 4.4

Final Compensation Period: Fees: \$5,917.50      Total Hours: 5.1

This category includes all matters relating to transactional, corporate governance and related matters involving the Debtors' business operations that are not part of a plan of reorganization or disclosure statement.

L.      Schedules/SOFA/U.S. Trustee Reports

Monthly Compensation Period: Fees: \$4,105.00      Total Hours: 5.6

Interim Compensation Period: Fees: \$9,880.00      Total Hours: 13.1

Final Compensation Period: Fees: \$55,695.00      Total Hours: 65.6

This category includes preparation of schedules and amendments, statements of financial affairs and amendments, operating reports and other reports required by the U.S. Trustee or the Court.

M.      Employee Issues

Monthly Compensation Period: Fees: \$0.00      Total Hours: 0.0

Interim Compensation Period: Fees: \$2,820.00      Total Hours: 2.4

Final Compensation Period: Fees: \$27,755.00      Total Hours: 30.7

This category includes all matters related to employee wages, benefits, collective bargaining issues, other employee relations matters, ERISA, and retirement benefits.

N.      Environmental

Monthly Compensation Period: Fees: \$0.00      Total Hours: 0.0

Interim Compensation Period: Fees: \$0.00      Total Hours: 0.0

Final Compensation Period: Fees: \$0.00      Total Hours: 0.0

This category includes all environmental matters, other than environmental aspects of the plan of reorganization.

O. Tax Issues

Monthly Compensation Period: Fees: \$0.00 Total Hours: 0.0

Interim Compensation Period: Fees: \$405.00 Total Hours: 0.6

Final Compensation Period: Fees: \$9,557.50 Total Hours: 11.9

This category includes all federal and state income, property, employment, excise and other tax matters, other than the tax aspects of the plan of reorganization.

P. Litigation/Adversary Proceedings

Monthly Compensation Period: Fees: \$3,240.00 Total Hours: 3.8

Interim Compensation Period: Fees: \$38,330.00 Total Hours: 37.9

Final Compensation Period: Fees: \$323,027.50 Total Hours: 388.3

This category includes all matters related to litigation and adversary proceedings.

Q-1. RL&F Retention

Monthly Compensation Period: Fees: \$0.00 Total Hours: 0.0

Interim Compensation Period: Fees: \$0.00 Total Hours: 0.0

Final Compensation Period: Fees: \$11,955.00 Total Hours: 15.9

This category includes all matters related to preparing applications to retain RL&F and supplements thereto.

Q-2. Retention of Others

Monthly Compensation Period: Fees: \$6,622.50 Total Hours: 7.2

Interim Compensation Period: Fees: \$18,235.00 Total Hours: 22.4

Final Compensation Period: Fees: \$59,845.00 Total Hours: 74.0

This category includes time spent reviewing applications for retention of other professionals, objecting to the retention of other professionals and assisting other professionals with preparing and filing retention applications.

R-1. RL&F Fee Applications

Monthly Compensation Period: Fees: \$9,035.00 Total Hours: 15.6

Interim Compensation Period: Fees: \$29,490.00 Total Hours: 51.3

Final Compensation Period: Fees: \$47,967.50 Total Hours: 84.6

This category includes all time spent preparing, reviewing, filing and circulating monthly invoices and fee applications for RL&F.

R-2. Fee Applications of Others

Monthly Compensation Period: Fees: \$20,557.50 Total Hours: 34.0

Interim Compensation Period: Fees: \$30,570.00 Total Hours: 47.5

Final Compensation Period: Fees: \$38,932.50 Total Hours: 58.9

This category includes time spent reviewing invoices or applications of other professionals, objecting to fees of other professionals and assisting other professionals with filing and circulating monthly invoices and applications.

S. Vendor/Suppliers

Monthly Compensation Period: Fees: \$0.00 Total Hours: 0.0

Interim Compensation Period: Fees: \$352.50 Total Hours: 0.3

Final Compensation Period: Fees: \$352.50 Total Hours: 0.3

This category includes all matters related to vendors and suppliers, including reclamation issues.

T. Non-Working Travel

Monthly Compensation Period: Fees: \$0.00 Total Hours: 0.0

Interim Compensation Period: Fees: \$0.00 Total Hours: 0.0

Final Compensation Period: Fees: \$4,125.00 Total Hours: 7.5

This category includes all travel time not otherwise chargeable.

U. Utilities

Monthly Compensation Period: Fees: \$0.00 Total Hours: 0.0

Interim Compensation Period: Fees: \$0.00 Total Hours: 0.0

Final Compensation Period: Fees: \$1,157.50 Total Hours: 1.7

This category includes all matters related to utility issues.

V. Insurance

Monthly Compensation Period: Fees: \$0.00 Total Hours: 0.0

Interim Compensation Period: Fees: \$80.00 Total Hours: 0.1

Final Compensation Period: Fees: \$1,825.00 Total Hours: 2.0

This category includes all matters related to insurance policies or coverage.

**Valuation of Services**

15. Attorneys and paraprofessionals of RL&F have expended a total of 197.4 hours in connection with this matter during the Monthly Compensation Period, as follows:

**Monthly Compensation Period**

<u>ATTORNEYS</u>	<u>HOURS</u>	<u>HOURLY RATE</u>
Daniel J. DeFranceschi	0.2	\$1,500.00
Zachary I. Shapiro	68.6	\$1,175.00
Robert C. Maddox	2.5	\$1,000.00
Huiqi Vicky Liu	48.5	\$800.00
Clint M. Carlisle	24.9	\$800.00
Colin A. Meehan	9.7	\$650.00

<u>PARAPROFESSIONALS</u>	<u>HOURS</u>	<u>HOURLY RATE</u>
Barbara J. Witters	1.7	\$425.00
Rebecca V. Speaker	23.1	\$425.00
Erin N. Weyl	5.0	\$425.00
Tesia S. Smith	8.3	\$325.00
Jeanne T. Kolb	4.9	\$325.00

The nature of the work performed by these persons is fully set forth in **Exhibit A** attached hereto.

These are RL&F's normal hourly rates for work of this character. The reasonable value of the services rendered by RL&F to the Debtors during the Monthly Compensation Period is \$165,385.00.

16. Attorneys and paraprofessionals of RL&F have expended a total of 635.2 hours in connection with this matter during the Interim Compensation Period, as follows:

**Interim Compensation Period**

<u>ATTORNEYS</u>	<u>HOURS</u>	<u>HOURLY RATE</u>
Daniel J. DeFranceschi	1.3	\$1,500.00
Tara J. Hoffner	0.4	\$1,295.00
Mark A. Kurtz	0.3	\$1,150.00
Zachary I. Shapiro	172.1	\$1,175.00
Cory D. Kandestin	1.6	\$1,175.00
Robert C. Maddox	22.6	\$1,000.00
Frank Y. Sun	0.2	\$900.00
Huiqi Vicky Liu	160.9	\$800.00
Clint M. Carlisle	145.1	\$800.00
Colin A. Meehan	44.4	\$650.00
Katherine R. Strauch	0.8	\$575.00

  

<u>PARAPROFESSIONALS</u>	<u>HOURS</u>	<u>HOURLY RATE</u>
Barbara J. Witters	2.2	\$425.00
Rebecca V. Speaker	47.9	\$425.00
Erin N. Weyl	12.0	\$425.00
Tesia S. Smith	9.2	\$325.00
Jeanne T. Kolb	14.2	\$325.00

The nature of the work performed by these persons is fully set forth in Exhibit A to each of the previously filed monthly fee applications. These are RL&F's normal hourly rates for work of this

character. The reasonable value of the services rendered by RL&F to the Debtors during the Interim Compensation Period is \$537,808.00.

17. Attorneys and paraprofessionals of RL&F have expended a total of 2,266.9 hours in connection with this matter during the Final Compensation Period, as follows:

**Final Compensation Period**

<u>ATTORNEYS</u>	<u>HOURS</u>	<u>HOURLY RATE</u>
Daniel J. DeFranceschi	24.9	\$1,500.00
Tara J. Hoffner	0.4	\$1,295.00
Mark A. Kurtz	99.3	\$1,150.00
Mark A. Kurtz	6.0	\$575.00
Zachary I. Shapiro	479.3	\$1,175.00
Katharine L. Mowery	39.2	\$1,050.00
Cory D. Kandestin	3.9	\$1,175.00
Robert C. Maddox	183.8	\$1,000.00
Jake M. Crosetto	22.6	\$950.00
Robert S. Kissel	2.0	\$900.00
Frank Y. Sun	75.6	\$900.00
Frank Y. Sun	1.5	\$450.00
Huiqi Vicky Liu	419.2	\$800.00
James F. McCauley	6.1	\$800.00
David E. Milano	2.8	\$800.00
Clint M. Carlisle	355.8	\$800.00
Thomas K. Malone	45.8	\$750.00
Alexander R. Steiger	0.1	\$750.00
Zachary J. Javorsky	11.9	\$700.00
Stanley N. Medlin	24.8	\$700.00
Gabriela Z. Monasterio	30.0	\$650.00
Colin A. Meehan	134.4	\$650.00
Nicholas A. Franchi	13.5	\$575.00
Katherine R. Strauch	0.8	\$575.00
 <u>PARAPROFESSIONALS</u>	 <u>HOURS</u>	 <u>HOURLY RATE</u>
Barbara J. Witters	15.0	\$425.00
Rebecca V. Speaker	137.7	\$425.00
Christopher J. Ruggiero	0.2	\$425.00
LeeAnn Scavina	1.2	\$425.00
Erin N. Weyl	17.7	\$425.00
Gregory J. Nequist	65.5	\$425.00
Carlos B. Terreforte	3.9	\$425.00
Tesia S. Smith	17.5	\$325.00
Jeanne T. Kolb	24.5	\$325.00

The nature of the work performed by these persons is fully set forth in Exhibit A to each of the previously filed monthly fee applications. These are RL&F's normal hourly rates for work of this character. The reasonable value of the services rendered by RL&F to the Debtors during the Final Compensation Period is \$1,958,695.50 (which does not include the Estimated Fees and Expenses for the Estimated Period or take into account the Agreed Fee Reduction).

18. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amounts requested by RL&F are fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title. Moreover, RL&F has reviewed the requirements of Local Rule 2016-1 and believes that this Application complies with such rule.

#### **Disclosures Pursuant to the U.S. Trustee Guidelines**

19. Section C.5 of the U.S. Trustee Guidelines requires an applicant to respond to six questions relating to its fee application. RL&F's disclosures in response to the six questions are contained in the Certification attached hereto as **Exhibit C**.

WHEREFORE, RL&F respectfully requests that the Court authorize that for the Final Compensation Period, a final allowance be made to RL&F pursuant to the terms of the Interim Compensation Order, the Plan, and the Confirmation Order, with respect to the sum of \$2,058,653.00<sup>3</sup> as final compensation for necessary professional services rendered and the sum of \$45,769.59 as final reimbursement of actual necessary costs and expenses, for a total of

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<sup>3</sup> For the avoidance of doubt, this amount includes the Estimated Fees and Expenses for the Estimated Period and takes into account the Agreed Fee Reduction.



\$2,104,422.59 and that such sums be authorized for payment and for such other and further relief as this Court may deem just and proper.

Dated: November 26, 2025  
Wilmington, Delaware

Respectfully submitted,

/s/ Zachary I. Shapiro  
**RICHARDS, LAYTON & FINGER, P.A.**

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